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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 JOHN WILLIAM KAIPO ENOS, an
individual and JOHNSON
12 ENTERTAINMENT, LLC, a Native
Hawaii limited liability company,

13 Plaintiffs,

14 v.

15 THE WALT DISNEY COMPANY, a
16 Delaware corporation; DISNEY
ENTERPRISES, INC., a Delaware
17 corporation; and DOES 1-10, inclusive,

18 Defendants.
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CASE NO. 2:23-cv-05790-DSF-AGR_x

Hon. Dale S. Fischer

**DECLARATION OF DR. ELLEN
SEITER**

Date: April 7, 2025

Time: 1:30 p.m.

Courtroom: 7D (First Street
Courthouse)

Complaint filed: July 18, 2023
FAC Filed: November 22, 2023
Trial Date: July 29, 2025

1 Dr. Ellen Seiter, pursuant to 28 U.S.C. § 1746, declares as follows:

2 1. I have been retained as an expert witness in this action. I have
3 personal knowledge of the facts set forth herein, which are known by me to be true
4 and correct, and if called as a witness, I could and would competently testify
5 thereto.

6 2. Attached hereto as Exhibit A is a true and correct copy of my initial
7 Expert Report in this action (the "Initial Expert Report"), dated November 22,
8 2024.

9 3. Attached hereto as Exhibit B is a true and correct copy of my rebuttal
10 Expert Report in this action (the "Rebuttal Expert Report"), dated January 13,
11 2025.

12 3. My Initial Expert Report and Rebuttal Expert Report are incorporated
13 herein as though set forth in full.

14
15 I declare under penalty of perjury under the laws of the United States of
16 America that the foregoing is true and correct.

17
18 Executed on: February __, 2025
19 Hong Kong

20 _____
21 Dr. Ellen Seiter
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Dr. Ellen Seiter, pursuant to 28 D.C. § 1746, declares as follows:

1. I have been retained as an expert witness in this action. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Exhibit A is a true and correct copy of my initial Expert Report in this action (the "Initial Expert Report"), dated November 22, 2024.

3. Attached hereto as Exhibit B is a true and correct copy of my rebuttal Expert Report in this action (the "Rebuttal Expert Report"), dated January 13, 2025.

3. My Initial Expert Report and Rebuttal Expert Report are incorporated herein as though set forth in full.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: February __, 2025
Hong Kong

Robert L. Taylor

Dr. Ellen Seiter